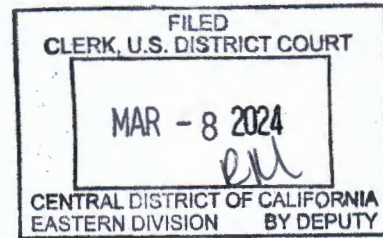


CARREA CHRISTOPHER  
P.O. BOX 741272  
SAN DIEGO, CALIFORNIA  
92174

PROPRIA PERSONA



EDCV24-00515-CAS-PVC

**UNITED STATES DISTRICT COURT,  
CENTRAL DISTRICT OF CALIFORNIA, EASTERN**

CARREA CHRISTOPHER,	)	CASE NO. <del>2:23-CV-01525</del>
	)	<del>JDP</del>
PLAINTIFFS,	)	<b>CIVIL COMPLAINT</b>
V.	)	<b>1. VIOLATION OF CIVIL RIGHTS 42</b>
RIVERSIDE COUNTY ;	)	U.S.C 1983&1981 EIGHTH CLAUSE
RIVERSIDE COUNTY,	)	CRUEL AND UNUSUAL PUNISHMENT
SHERIFF DEPARTMENT;	)	<b>2. VIOLATION OF CIVIL RIGHTS 42</b>
RIVERSIDE COUNTY,	)	U.S.C. 1983 & 1981 (FOURTEENTH
SHERIFF, CHAD BIANCO;	)	AMENDMENT)
RIVERSIDE COUNTY,	)	<b>3. VIOLATION OF CIVIL RIGHTS 42</b>
CORONER DEPARTMENT,	)	U.S.C 1983, 1981, 1988(CONSPIRACY)
OF RIVERSIDE COUNTY;	)	<b>4. VIOLATION OF CIVIL RIGHTS 42</b>
CITY OF HEMET; CITY OF	)	U.S.C.A. 1983 & 1981 (MUNICIPAL
HEMET POLICE DEPT.;	)	LIABILITY-MONELL)
HEMET POLICE CHIEF,	)	<b>5. VIOLATION OF CIVIL RIGHTS 42</b>
MICHAEL ARELLANO; ABEL	)	U.S.C. 1983 & 1981(FAILURE TO
RIOS;	)	TRAIN AND SUPERVISE-CANTON)
, LT.'S,	)	

**PAGE ONE**

CAPTAINS AND STAFF ) **SUPPLEMENTAL STATE**  
OF CDCR LANCASTER ) **CLAIMS**

AMENDED COMPLAINT FOR DAMAGES(2:23-CV-01525-JDP) - 1

**FACILITY AND DOES I )**  
**THROUGH X )**  
**ALL DEFENDANTS ARE )**  
**BEING SUED IN BOTH )**  
**INDIVIDUAL AND )**  
**OFFICIAL CAPACITY )**  
**DEFENDANTS. )**  
**JURY DEMAND**

6. INTENTIONAL INFLICTION OF  
DISTRESS

7. CALIFORNIA CIVIL CODE 52

8. NEGLIGENCE AND BREACH

OF DUTY ASSAULT AND BATTERY

### **PLAINTIFF ALLEGES AS FOLLOWS:**

This is a complaint for damages based upon federal civil rights and state constitutional rights violation by the defendants listed above. This case is brought pursuant to 42 U.S.C. 1983, 1981, 1988 and California state Law. Federal jurisdiction is based upon 28 U.S.C. 1331, 1343 (a)(1-4) . This Court has supplemental jurisdiction over the state law claims pursuant to 28 U.S.C. 1367(a).

### **JURISDICTION**

1. Plaintiff brings this case pursuant to 42 U.S.C. \*1981, 42 U.S.C. \*1983, 42 U.S.C. \*1988 and California state law. Jurisdiction is based upon 28 U.S.C. 1331, 28 U.S.C. 1343 (1-4). The UNITED STATES CONSTITUTION; Supplemental Jurisdiction exist over the CALIFORNIA STATE CLAIMS; and defendants pursuant to 28 U.S.C. 1367.

**PAGE TWO**



**PARTIES**

**Plaintiff**

2. Plaintiff CARREA CHRISTOPHER (“Carrea”) was a resident and private citizen of the State of California at all times material to this Complaint.

**Defendants**

3. Plaintiff is informed, believes, and thereupon alleges that Defendants, RIVERSIDE COUNTY, RIVERSIDE COUNTY SHERIFF DEPARTMENT, RIVERSIDE COUNTY SHERIFF, CHAD BIANCO, RIVERSIDE COUNTY CORONER DEPARTMENT, RIVERSIDE COUNTY CORONER, CITY OF HEMET; CITY OF HEMET, POLICE DEPT. HEMET POLICE CHIEF, MICHAEL ARELLANO; ABEL RIOS,

,are duly constituted governmental entities in the State of California, and is or was, the employer of all individually named Defendants including, but not limited to those who are sued in their individual and official capacities, as well as one, or all, of Defendants DOES 1 through 10.

1. The identities, capacities, and/or or nature of involvement of Defendant DOES 1 through 10 (“Doe defendants”) are presently unknown to plaintiffs therefore sue such persons using “does” as factiously-named defendants. Plaintiff is informed, believes, and thereupon alleges that there is likely to be EVIDENTIARY SUPPORT TO PROVE

**PAGE THREE**

1 2. THAT EACH DOE DEFENDANT WAS INVOLVED IN  
2 SOME MANNER AND LEGALLY RESPONSIBLE FOR  
3 THE ACTS, OMMISSIONS, AND/OR BREACHES OF  
4 DUTIES ALLEGED. PLAINTIFF WILL AMEND THE  
5 COMPLAINT TO NAME THE DOE DEFENDANTS  
6 UPON LEARNING THEIR TRUE IDENTITIES AND  
7 ROLES IN THE ACTION COMPLAINED OF HEREIN.

8 3. PLAINTIFF IS INFORMED, BELIEVES, AND  
9 THEREUPON ALLEGES THAT ALL DEFENDANTS  
10 EMPLOYED BY DEFENDANT, RIVERSIDE COUNTY  
11 AND THE CITY OF HEMET , WERE, AT ALL TIMES  
12 RELEVANT AND MATERIAL TO THIS COMPLAINT,  
13 ACTING WITHIN THE COURSE AND SCOPE OF  
14 THEIR EMPLOYMENT DUTIES FOR DEFENDANTS, ,  
15 THEREUPON ALLEGES THAT ALL DEFENDANTS  
16 EMPLOYED BY DEFENDANT, RIVERSIDE COUNTY  
17 AND THE CITY OF HEMET AND UNDER COLOR OF  
18 LAW. PLAINTIFF IS INFORMED, BELIEVES, AND  
19 THEREUPON ALLEGES THAT EACH OF THE  
20 INDIVIDUAL DEFENDANTS' ACTS WERE KNOWN  
21 TO, DISCOVERED BY, APPROVED BY, AND OR  
22 RATIFIED AND DEFENDED BY DEFENDANTS'  
23 EMPLOYED BY DEFENDANT, RIVERSIDE COUNTY  
24 AND THE CITY OF HEMET , BY AND THROUGH  
25 THEIR POLICY MAKERS, DECISION MAKERS,  
26 OFFICIALS, OFFICERS, AND/OR SUPERVISORS,  
27 **PAGE FOUR**  
28



1 LT'S, SERGEANTS, AND APPLICABLE DOE  
2 DEFENDANTS. THE  
3 ABOVE ARE TO OVERSEE OTHERS ASWELL  
4 AS THEMSELVES IN THEIR DAILY TASKS, AND  
5 ARE EXPEXTED TO SET A STANDARD FOR  
6 LOWER-RANKED EMPLOYEES TO LIVE UP  
7 TO, AT ALL TIMES RELEVANT AND MATERIAL  
8 TO THIS COMPLAINT, WERE ACTING WITHIN  
9 THE COURSE AND SCOPE OF THEIR  
10 EMPLOYMENT.

- 11 6. Plaintiff is informed, believes, and thereupon alleges  
12 that officials, supervisors, policy makers, and other  
13 Individuals with the authority to set or modify  
14 Municipal, state and/or departmental policy, *de jure* or  
15 *De facto*, of COUNTY and CITY departments and/or  
16 Doe Defendants, participated in, approved of, ratified,  
17 and/or failed to prevent the acts by all defendants  
18 and/or failed to prevent the acts by all Defendants and  
19 Doe Defendants of which Plaintiffs complain herein.
- 20 7. Plaintiff is informed, believes, and thereupon alleges  
21 That at all times herein mentioned, each of the  
22 Defendants—including officials, supervisors, lt.,  
23 Sergeants, CORONERS and other policy makers from  
24 THE COUNTY OF RIVERSIDE AND OR THE  
25 CITY OF HEMET , and Their agents—was the agent,  
26 employee, or Co-conspirator of one other, some, or  
27 all of their  
28

**PAGE FIVE**

1 Co-Defendants. Plaintiffs is informed, believes, and  
2 thereupon alleges that each of the Defendants, acting  
3 individually and/or in concert with each other,  
4 engaged in a common plan OF NO PLAN. breach of  
5 duty, negligence, failure to prevent, withheld info, and  
6 due process of the law, among others described herein.  
7 Each and all of the things done by each Defendants  
8 against Plaintiff's, as mentioned in this entire  
9 Complaint, were done partially if not entirely, to the  
10 Plaintiff's. In doing each and all of the things herein  
11 mentioned, or neglecting or intentionally failing to  
12 rectify said misconduct, each and all Defendants were  
13 acting pursuant to a *de facto* policy and within the  
14 scope of such Government entity, Government  
15 agency, Government personnel, such agency,  
16 employment, and conspiracy and with full permission,  
17 allowed to go right back to DUCKING AND  
18 DODGING THEIR DUTIES. IN RACIAL  
19 ANIMUS ,FOURTEENTH AMENDMENT AND  
20 FIFTH AMENDMENT OF THE UNITED STATES  
21 CONSTITUTION, with full knowledge, approval,  
22 ratification, and support of each other

21 **8a.** IF DISCRIMINATORY INTENT PLAYS ANY  
22 ROLE IN A DEFENDANTS DECISION WITH A  
23 PLAINTIFF, EVEN IF IT IS MERLY ONE  
24 FACTOR AND NOT THE SOLE CAUSE OF  
25 THE DECISION, THEN THAT PLAINTIFF HAS  
26 NOT ENJOYED THE SAME RIGHTS AS A WHITE

27 **PAGE SIX**



1 CITIZEN, THIS WE CONCLUDE, IS THE  
2 NATURAL READING OF 1981, 1983

3 b. THEREFORE, UNLIKE THE ADEA OR TITLE  
4 VII'S RETALIATION PROVISION, 1981'S TEXT  
5 PERMITS AN EXCEPTION TO THE DEFAULT  
6 BUT-FOR CAUSATION STANDARD BY VIRTUE  
7 OF "AN INDICATION TO THE CONTRARY IN  
8 THE STATUTE ITSELF." *NASSAR*, 570 U.S. AT  
9 347.

10 c. HAVING DETERMINED THAT A PLAINTIFF  
11 IN A 1981 ACTION NEED ONLY PROVE THAT  
12 DISCRIMINATORY INTENT WAS A FACTOR  
13 INN AND NOT NECESSARILY THE BUT-FOR  
14 CAUSE OF A DEFENDANT.

15 d. In this case both Plaintiff CARREA  
16 CHRISTOPHER AN AFRO AMERICAN IS IN AN  
17 PROTECTED CLASS, were inflicted with harm due  
18 to their race and since it happened the defendants  
19 pasture is so what, in one of the most serious section  
20 of Civil Rights of this Nation the Court has more than  
21 an obligation to PREVENT.,

## 22 **FACTS COMMONM TO ALL CLAIMS FOR RELIEF**

23 **JANUARY 20 and 21, 2023**

24 **9. On or about 01/23,24/2023 HEMET,**  
25 **California, ALTHOUGH THERE WERE**  
26 **NUMEROUS CALLS TO THE POLICE**  
27 **DEPARTMENT THAT NELLIE RIOS HAD**  
28 **THREATEN TO KILL HER SELF THE HEMET**

**PAGE SEVEN**

1 POLICE DEPARTMENT OF HEMET  
2 AND OTHERS; RESPONSIBLE FOR THE WELL  
3 BEING OF NELLIE RIOS, ALTHOUGH  
4 INFORMED THERE WAS WEAPONS IN THE  
5 HOME, PERFORMED AN HALF HEARTED  
6 SEARCH OF THE WEAPONS. GOT A FEW  
7 WEAPONS AND LEFT THE REST. SOON THERE  
8 AFTER THERE WAS OTHER CALLS AS TO  
9 PEOPLE CONCERN ABOUT WHY WEAPONS  
10 WERE STILL IN THE HOME AND NELLIE WAS  
11 GOING TO KILL HER SELF AND WHY DIDN'T  
12 THE POLICE DEPARTMENT TAKE ALL THE  
13 WEAPONS WHEN THEY FIRST WENT THERE.  
14 HOW COULD THE DEFENDANTS MISS A GUN  
15 IN THEIR SEARCH Due to THE FACT POLICE  
16 DEPARTMENTS IN CALIFORNIA GO IN HOMES  
17 AND FIND A NEEDLE THIMBLE WITH DRUGS  
18 IN THEM NO BIGGER THEN A DIME. The  
19 Defendants, placed NELLIE RIOS, in a position to be  
20 harmed and/or killed BUT THE POLICE DEPT OF  
21 HEMET , Ignored all protection and necessary  
22 ATTENTIVENESS AND RISK AVOIDANCE, DUE  
23 TO THE FACT NELLIE WAS AFRO AMERICA.  
24 The vigilance and prudence that was missing due to  
25 the racial animus threw all carefulness and vigilance  
26 out the window. Nellie Rios was shoot a little while  
27 later and killed. It was stated Abel Rios her husband  
28 was apart of the local law enforcement. The  
Defendant. Abel Rios, after taking all of the money  
**PAGE EIGHT**



1 Nellie Rios , had and spent it on his girl friend.  
2 THE HEMET POLICE DEPARTMENT showed  
3 back up after numerous calls. The police department  
4 with guns drawn startled Nellie to the point she shoots  
5 herself. Immediately the City of Hemet police  
6 Department refused all info from her family. Not only  
7 did the City of Hemet Police Department begin to  
8 cover things from Nellie's family but the Riverside  
9 County Coroner Office, with the Riverside County  
10 Sheriff Department also covered things from the  
11 family for more then seven months. The wait delayed  
12 the actions.

13 10. The Defendants of this case have a long history OF  
14 refusing to place checks and balances. The Defendants  
15 position is so what to AN AFRO AMERICAN HARM  
16 AND DEATH. The Defendants show preferential  
17 treatment for other race in riverside county. The  
18 Defendants in supervisorial position and policy  
19 makers defend racial animus in their history and  
20 especially in this case and the actions of this case.

21 11. The Defendants of this case showed a deliberate  
22 indifference of Nellie rios and the Plaintiff of this  
23 case. The Defendants set in place different levels of  
24 concern for afro Americans due to their custom and  
25 history of the failure to Prevent serious harm and grim  
26 sever action to and against afro Americans. The  
27 actions of this case could have been prevented if the

28 **PAGE NINE**

1 Act or Procedure set in place historically of racial  
2 animus the Defendants would have at least searched as  
3 much as they do looking for a weed joint. The  
4 Defendants Know of the grim danger and the failure to  
5 properly search a home of an individual threatening to  
6 kill themselves. The Defendants, did'nt use these  
7 measures, processes and Methods they use on those  
8 that are not afro americans. The Defendants however  
9 has failed to follow up on these procedures to insure  
10 they are in place. The fact that horror happens as in  
11 this case, when procedures especially in a situation of  
12 the threat of death setting and situations. Those  
13 situations are due to higher levels of harm, should not  
14 present a failure to moniter, is ludicrous and  
15 outrageous. The Defendants were told of a serious  
16 threat of suicide by close friends due to the threats of  
17 her husband, Able Rios, to take her children from her  
18 due to his relationship with another woman. The fact  
19 that supervisors reports of their procedures is the  
20 trusted report of their procedures is preposterous. The  
21 fact seldom the higher level defendants in this case are  
22 held accountable supervision are nonsensical. The fact  
23 lower levels of the defendants are told don't say  
24 anything to them. These acs are deliberate indifference  
25 of both Nellie rios and the plaintiffs of this case, her  
26 real family. It is hard to feather the fact the Defendants  
27 are not governed of by separate accountable entities.  
28 The Defendants governing them selves is like jessi  
james watching frank james.

**PAGE TEN**



1 THE FACT THE DAY BEFORE NELLIE RIOS  
2 ACTION WERE INFORMED OF TO THE  
3 DEFENDANTS AND THEY FAILED TO ACT IS  
4 REASON FOR THE DEATH OF NELLIE RIOS  
5 AND THE FAILURE THAT COULD HAPPEN TO  
6 ANYONE ELSE FAMILY MEMBERS WAS NOT  
7 observed, scrutinized and examined by higher  
8 supervised officers is the failure of those above them  
9 that set in place policies. It also must, be noted, a  
10 policy not enforced to protect is deliberate  
11 indifference of THE PLAINTIFF AND families.

12 12. In this case, A grave, sever and critical danger,  
13 COULD HAVE BEEN PREVENTED. ALL HIGHER  
14 LEVELS OF THIS CASE should have prevented; In  
15 this case the complexity and difficulty unimaginable  
16 and unconceivable happened due to deliberate  
17 indifference that has happened so long the defendants  
18 now feel comfortable in deliberate indifference. The  
19 Plaintiff, Carrea Christopher, AND NELLIE  
20 CHRISTOPHER was placed in DELIBERATE  
21 INDIFERENCE More then anyone should have ever  
22 been placed. Staff protect their abusive colleagues by  
23 failing to investigate claims or respond meaningfully,  
24 and by retaliating against those who report abuse.

25 13. People have no way to safely report misconduct.  
26 Survivors must frequently report to the same staff  
27 members who abused them or who allowed the abuse

28 **PAGE ELEVEN**

1 to occur. When survivors report abuse to staff, their  
2 experiences are often not kept confidential. When  
3 survivors attempt to use the “confidential” mail  
4 system, they must do so in full view of staff and  
5 other’s. As a result, survivors frequently face  
6 immediate retaliation. This pervasive retaliation deters  
7 many survivors from reporting their abuse. This  
8 dangerous state of affairs has continued, unabated,  
9 across multiple decades and multiple administrations.  
10 In recent years, the State of California prison system  
11 has been so severe that the facilities of California has  
12 become the center of a sprawling criminal entity.  
13 Investigation, multiple Congressional inquiries, and  
14 national media attention. The United States District  
15 Courts have Subcommittee on Investigations devoted  
16 multiple hearings to addressing its causes and impact,  
17 but the defendants have continued the abuse in  
18 “horrific”. The Defendant’s of this case as half  
19 hearted and a rubber stamp as all their investigation  
20 show defendants practices as “seriously flawed,” and  
21 concluding that the defendants of this case  
22 management failures enabled continued abuse of  
23 citizens of color.

- 24 14. State Of California law enforcement agencies and  
25 employees and even prisons have all been found  
26 unconstitutional although agencies have alleged they  
27 were above ground.

28 **PAGE TWELVE**



At the federal prisons investigation have started for federal prisons ,including former Warden Ray Garcia and a former chaplain—have been charged with sexual misconduct for incidents spanning from 2019 into 2021, with more charges likely forthcoming. See United States v. Garcia, No. 4:21-cr-00429-YGR (N.D. Cal.) (sentenced to 70 months in prison and 15 years of supervised released following jury trial); United States v. Highhouse, No. 4:22-cr-00016-HGS (N.D. Cal.) (sentenced to 84 months in federal prison and 5 months of supervised release following guilty plea); United States v. Chavez, No. 4:22-cr-00104-YGR-1 (N.D. Cal.) (sentenced to 20 months in federal prison and 10 years of supervised release following guilty plea); United States v. Klinger, No. 21-MJ-71085-MAG (N.D. Cal.) (awaiting sentencing following guilty plea); United States v. Bellhouse, No. 4:22-cr-00066- YGR (N.D. Cal.) (found guilty following jury trial; awaiting sentencing); United States v. Smith, No. 4:23-cr-00110-YGR-1 (charges pending); United States v. Nunley, No. 4:23-cr-00213-HSG (N.D. Cal.) (awaiting sentencing following guilty plea for 4 counts of sexual abuse of a ward, 5 counts of abusive sexual contact, and 1 count of false statements to a government agency).

**PAGE THIRTEEN**

15. Despite their awareness of these long-standing problems, Defendants have failed to take critically needed action, including failing to: (1) adequately, hire, train and supervise employees to prevent their ongoing misconduct and abuse of power; (2) implement a confidential and reliably available method for individuals to report abuse to fully independent outside authorities who are not employed by the RIVERSIDE COUNTY OR RIVERSIDE CITY (3) properly investigate claims of abuse; (4) cease the policy and practice of placing INDIVIDUALS who report abuse into quiet confinement; (5) address rampant retaliation against survivors, including but not limited to which harm survivors and deter others from reporting; (6) ensure that officers who have substantiated claims of not following public guild lines and ARRANGEMENTS and harassment against those who report in which officers are promptly fired and not permitted to return to law enforcement employment; (7) provide constitutionally adequate medical and mental health care to survivors of abuse; (8) provide timely and consistent access to confidential legal reports ; (9) provide survivors with documentation of reports of staff misconduct and assist in the investigation of staff abuse; (10) create a process to assist survivors of abuse with compassionate release petitions; (11) install fixed time restraints on reporting periods.

**PAGE FOURTEEN**



1 IN THIS CASE THE COARONERS OFFICE TOOK  
2 OVER SIX MONTHS TO SEND THE PLAINTIFF  
3 HIS OWN DAUGHTERS REPORT WHICH HE  
4 WAS ASKED TO PAY THREE MONTHS AHEAD  
5 OF TIME THAT LISTED EVERYTHING THE  
6 COARNERS OFFICE KNEW SIX MONTHS  
7 PRIOR.

8 THIS SHOULD NOT BE. IT IS A TEXT BOOK  
9 DEFINITION OF DELIBRATE INDIFFERENCE.

10 This is abusive gratification for the purpose of  
11 humiliating, degrading, and demeaning the Plaintiff  
12 CARREA CHRISTOPHER WHO WAS ALREADY  
13 IN PAIN.

## 14 **JURISDICTION AND VENUE**

- 15
- 16 **16.** An actual present and justifiable controversy exists  
17 between the parties within the meaning of 28 u.s.c  
18 2201(a).
- 19
- 20 **17.** This action involves claims arising under the United  
21 States Constitution. The Court has jurisdiction over  
22 the action to 28 U.S.C. 1331 and 1332, 42 U.S.C.A.  
23 1981; 42 U.S.C.A. 1983, 1988 and authority to issue a  
24 declaratory judgment pursuant to 28 U.S.C 2201 and  
25 2202.
- 26

27 **PAGE FIFTEEN**

- 1 **18.** Venue is proper in this district under U.S.C. 552(a)(4)  
2  
3 (B) and 28 U.S.C. 1391(c) because at least one or  
4 more defendants resides in this district and a  
5 substantial part of the events or omissions giving  
6 rise to the claims occurred in this district. This Court  
7 can also hear state claims.

### 8 **FACTUAL ALLEGATIONS**

- 9 **19.** Federal Law Requires THE COUNTY OF  
10 RIVERSIDE AND THE CITY OF RIVERSIDE to  
11 Take Action to Prevent and Appropriately Respond to  
12 Misconduct. Staff abuse of people constitutes a form  
13 of torture that violates the Eighth Amendment. See  
14 *Bearchild v. Cobban*, 947 F.3d 1130, 1144 (9th Cir.  
15 2020). Such abuse contact also violates federal  
16 criminal law and state of California criminal law. See,  
17 e.g., 18 U.S.C. §§ 2243, 2244. 46. These regulations  
18 were immediately binding on defendants. Federal and  
19 State law has a “zero-tolerance policy for abuse and  
20 harassment”; prevention, reporting, detection, and  
21 response to such behavior. The right to be free from  
22 retaliation for reporting abuse and harassment. If you  
23 something say something policy should not be frown  
24 on especially by a FEDERAL COURT.

25 Investigators must be specially trained in abuse  
26 investigations and must “gather and preserve

27 **PAGE SIXTEEN**



direct and circumstantial evidence,” including interviewing “alleged victims, suspected perpetrators, and witnesses” and “shall review prior complaints and reports of abuse involving the suspected perpetrator. NELLIE RIOS AND OTHERS HAD REPORTED ABUSE BY ABLE RIOS but riverside ignored the reports. The Defendants failed in all areas and has failed in all areas. The agency is prohibited from determining an alleged victim’s credibility based on their “status as inmate or staff.” Investigations are further required to “include an effort to determine whether staff actions or failures to act contributed to the abuse. “The departure of the alleged abuser or victim.

**DEFENDANTS IN VIOLATION OF STATE  
OF CALIFORNIA CIVIL CODES SUCH AS  
CALIFORNIA CIVIL CODE 52.1**

20. PLAINTIFF’S incorporates all preceding paragraphs, as fully set forth herein, defendants violated Mr. Carrea Christopher clearly established rights under the UNITED STATES AND CALIFORNIA CONSTITUTIONS, as well as state and federal law, which include, but are not limited to parental rights:

(i) California Constitution, article 1:

**PAGE SEVENTEEN**

1 SECTION 1. All people are by nature free  
2 and independent and have inalienable rights.  
3 Among these are enjoying and defending life  
4 and liberty, acquiring, possessing, and  
5 protecting property, and pursuing and  
6 obtaining safety, happiness, and privacy.

- 7  
8  
9 (ii) Section 1 of Article III of the current  
10 State Constitution provides  
11 that California "is an inseparable part  
12 of the United States of America." The  
13 (iii) State Constitution provides that the  
14 U.S. Constitution is the supreme law  
15 of the land. U.S. Constitution Does  
16 Not Provide for Secession.

17  
18 **21. FOURTEENTH AMENDMENT OF THE**  
19 **UNITED STATES CONSTITUTION:**No  
20 State shall make or enforce any law which  
21 shall abridge the privileges or immunities of  
22 citizens of the United States; nor shall any  
23 State deprive any person of life, liberty, or  
24 property, without due process of law; nor  
25 deny to any person within its jurisdiction the  
26 equal protection of the laws.

27 **PAGE EIGHTEEN**  
28



**VIOLATIONS OF CIVIL RIGHTS (42 USCA  
1981; 42 USCA 1983; 42 USCA 1988  
CONSPIRACY TO VIOLATE CIVIL RIGHTS  
BY PLAINTIFF'S**

26. Plaintiff's incorporates all paragraphs, as though fully set forth herein.
27. This cause of action arises under 42 U.S.C.A. 1981; 42 U.S.C.A. 1983; 42 U.S.C.A. 1988; AND CALIFORNIA CONSTITUTION SECTION 17 , wherein Plaintiff's seeks to Redress deprivation's under color of law of rights, privileges or immunity secured by them by the First, Fifth, Eighth and Fourteenth amendment to the UNITED STATES CONSTITUTION AND THE STATE OF CALIFORNIA CONSTITUTION.
28. Defendants, each of them, acted as described herein above, in conspiracy with, and with the agreement, permission, ratification, and approval of each other to violate Carrea Christopher civil rights afforded under the United States and California Constitution and laws. Carrea will be wounded for the rest of HIS life and family, by the acts of the ones that has the most responsibilities to protect

**PAGE NINETEEN**

these rights, were also in Breach Of Duty and Negligence and the causation and damages. In the jurisdiction of California, a wrongful death case can be made, by the negligence of the Defendants, for one they did an half hearted search for weapons, displayed by the fact they so many in the home of one that threaten to kill themselves, by the breach of duty of Defendants, for one they did an half hearted search for weapons, displayed by the fact they so many in the home of one that threaten to kill themselves, and the defendants were the causation and the damages of this case. The Defendants, acted irresponsibly and failed to act at all leading to the fatal consequences of this case.

29. The United States Constitution provides a parent and child relationship is Constitutional, the clause The right to life that is inherent by nature in every individual.

**VIOLATION OF CIVIL RIGHTS**  
**(42 U.S.C 1983; 42 USCA 1981)**  
**(CALIFORNIA CONSTITUTION SECTION 17)**  
**UNCONSTITUTIONAL POLICY, CUSTOM, OR PROCEDURE**  
**(MONELL) BY AND OF PLAINTIFF'S AGAINST DEFENDANT'S**

30. Plaintiff's incorporates all paragraphs, as though fully set forth herein.

**PAGE TWENTY**



1       **31.** This cause of action arises under 42 USCA 1981; 42  
2       USCA 1983, UNITED STATES CONSTITUTION  
3       AND STATE OF CALIF. CONSTITUTION  
4       WHEREIN Plaintiff's seek to redress a deprivation  
5       under color of law of a right, privilege, or immunity  
6       secured to them by the First, Fifth, Fourteenth  
7       Amendments OF THE UNITED STATES  
8       CONSTITUTION, and the state of California  
9       Constitution Sec. 17, Breach of Duty and Negligence.

10       **32.** The Defendants, all violated Carrea Christopher ,  
11       Constitutional rights as alleged by creating and  
12       maintaining the following unconstitutional customs  
13       and practices, *inter alia*.

14               (i) Carrea Christopher, alleges the defendants has  
15       a *de facto* policy, customs, and/or practices of  
16       allowing staff to focus more on arrest then protection.  
17       If it was a drug search the defendants would have went  
18       through the home with a fine tooth comb. The fact it  
19       was to protect the daughter of Carrea  
20       Christopher,(Nellie Rios) it was a five minute stunt  
21       then they left after all it was'nt looking for a joint,  
22       after all it wouldnt be no problems to fabricate a story  
23       that they did a complete search despite leaving  
24       weapons in the home of an individual that her friends  
25       stated she wanted to kill herself

26                               **PAGE TWENTY ONE**

1 THE DEFENDANTS, HAVE A  
2 policy, custom or practice of failing to discipline,  
3 failing to investigate, and of retaining info.

4 THE PLAINTIFF'S request all video, photo's, phone  
5 calls recorded and reports be kept. The defendants fail  
6 in retaining personnel info of violation of inmates  
7 constitutional rights. The Defendants fail to remove  
8 officers who display racial animus.

9 **33.** . The Plaintiff's is informed and believes and  
10 alleges that the Defendants, has a *de facto* policy or  
11 custom, that caused and were the moving force and/or  
12 affirmative link behind some or all of the violations of  
13 the Christopher's Constitutional rights at issue in this  
14 case.

15 **34.** The Plaintiff's is informed and believes and thereupon  
16 alleges that the Defendants, has a *de facto* policy or  
17 custom, that are intentional and/or the results of  
18 deliberate indifference on the part of the defendants by  
19 and through its decision makers.

20 **35.** The foregoing unconstitutional customs and practices  
21 were a direct and legal cause of harm to Carrea  
22 Christopher.

23 **36.** Carrea Christopher's specifically alleges that the  
24 defendants policies, customs, and/or practices, as  
25 described herein, were within the control of  
26 Defendants and feasibility of Defendants, to alter,

27 **PAGE TWENTY TWO**



adjust and/or correct so as to prevent some or all of the unlawful acts and injury complained of herein by Carrea Christopher.

37. IF the defendants had proper training and a zero tolerance for the action of staff and those above them the acts of this complaint would have never happened. In fact decades and decades, there has been high tolerance, lenience and acceptance for the acts of this complaint. In fact the acts of this complaint by the Defendants are their policies, customs and/or practices.

### **VIOLATION OF CALIFORNIA CIVIL CODE 52:1**

38. Plaintiff's incorporates all preceding paragraphs, as though fully set forth herein.

39. Defendants violated Carrea Christopher, clearly established rights under the United States and California Constitution, as well state and federal law, which include, but are not limited to, the following:

(i) Fourteenth amendment to the United States Constitution(violated by the defendants)

(ii) California Constitution, Article 1:

(iii) California Constitution, Article 1:

Sec. 1 right to happiness and privacy(violated by The defendants)Sec. 7 right to due process(violated by defendants) Defendants violated the Christopher's clearly established rights under the United States and California law .

**PAGE TWENTY THREE**

1       **40.** The Defendants is liable to the Christopher's for their  
2       acts and the acts of its public employees, the  
3       individual defendants herein, for conduct and/or  
4       ommissions herein alleged pursuant to the doctrine of  
5       respondeat Superior, codified at California  
6       government code 815.2. **IT MUST MUST BE**  
7       **NOTED, THE PLAINTIFF CANNOT SLEEP**  
8       **GOOD AND CANT'T GET THE ACTS OF THIS**  
9       **CASE OUT OF THEIR HEAD AND MINDS,**  
10       **OTHER FAMILY MEMBERS ASWELL.**

11       **NATURE OF ALL DEFENDANTS ACTION**

- 12       **41.** Defendants acted maliciously and oppressively in  
13       violating the CHRISTOPHER'S clearly established  
14       rights under the United States and California.  
15       **42.** As a result of Defendants unlawful conduct as alleged  
16       herein, the Christopher's has suffered, and will  
17       continue to suffer, the above and below stated  
18       damages in an amount according to proof including  
19       the cost to remedy the unlawful conduct.

20       **PRAYER FOR RELIEF**

- 21       **43. WHEREFORE, PAUL CHRISTOPHER AND**  
22       **CARREA CHRISTOPHER;** prays for the following  
23       relief from Defendants and each of them, for each  
24       Defendant, and for each of them, for each of the above  
25       causes of action;  
26       (i) For compensatory damages including general and  
27       special damages according to proof.

28       **PAGE TWENTY FOUR**



- (ii) For punitive damages pursuant to 42 U.S.C \*1983 ;42 U.S.C. 1981; 42 U.S.C. 1988 and California Civil Code 3294 and 52.1, and any other applicable laws or statutes, in an amount sufficient to deter and make an example of each.
- (iii) for statutory damages according to proof
- (iv) for prejudgment interest according to proof.
- (v) for such further relief which is just and proper.

**DATED: MARCH 4, 2024**

**RESPECTFULLY SUBMITTED,**

**BY:**

  
**CARREA CHRISTOPHER**

**PAGE TWENTY FIVE**

Retail



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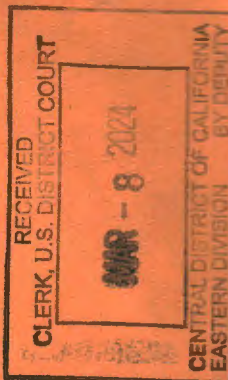


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TO: UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
CLERK OF THE COURT  
3470 12<sup>TH</sup> STREET  
RIVERSIDE, CALIFORNIA  
92501



C. CHASION  
P.O. BOX 741272  
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